

# EXHIBIT 155

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Charlene Alexander, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I am employed by Oregon State University (“OSU”) and serve as Vice President and Chief Diversity Officer. Prior to joining OSU, I was a Professor of Counseling Psychology and a Professor in the College of Education at Ball State University. I subsequently directed the School Counseling Program in the Department of Counseling Psychology at Ball State. In 2013, I became Ball State’s Associate Provost for Diversity and Director of the university’s Office of Institutional Diversity. Additionally, I am a naturalized U.S. citizen, coming to the United States to attend college, and understand first-hand the immigration process and the responsibilities of citizenship.

3. Oregon State University is a comprehensive, research intensive public land-grant university whose mission statement provides: “As a land grant institution committed to teaching, research and outreach and engagement, Oregon State University promotes economic, social, cultural and environmental progress for the people of Oregon, the nation and the world. The mission is achieved by producing graduates competitive in the global economy, supporting a continuous search for new knowledge and solutions and maintaining a rigorous focus on academic excellence, particularly in the three Signature Areas: Advancing the Science of Sustainable Earth Ecosystems, Improving Human Health and Wellness, and Promoting Economic Growth and Social Progress.”

4. Oregon State University has a current enrollment population of 30,354 students. OSU is committed to equitable student success, which includes a commitment to educational access for Deferred Action for Childhood Arrivals (“DACA”) recipients – also known as “Dreamers.” OSU does not specifically collect data or track the number of DACA recipient students enrolled at OSU. However, OSU is subject to Oregon’s “tuition equity” law, codified at Or. Rev. Stat. § 352.287. Under that statute, an Oregon public university “shall exempt a student

who is not a citizen or a lawful permanent resident of the United States from paying nonresident tuition and fees for enrollment” if the student meets certain criteria. *Id.* at (1).

5. Currently there are 40 students at OSU who pay in-state tuition and fees, pursuant to the tuition equity law. OSU understands a substantial portion of those students are DACA recipients. OSU expects that DACA students may elect to drop out of the university if they face the imminent threat of arrest and deportation, would be unable to finance their education through work, or would be unable to apply their education in the United States by working after graduation. Additionally, any student who is actually arrested and deported would not be able to continue their education at OSU. Thus, if DACA recipient students were to drop out as a result of the rescission of DACA, the projected financial loss to OSU would be up to and including approximately \$705,000.

6. The mission of OSU as a land grant institution is to promote economic, social, cultural and environmental progress for the people of Oregon. We know the impact that DACA students have had on the economic, social and cultural climate at OSU. The implications of the loss of those students to our university and the state of Oregon are significant. First however, as an institution committed to equity and inclusion, we must examine the impact of this decision on DACA students at OSU personally.

7. These impacts are financial, psychological, and social. DACA students rely on the ability to work to support not only their education, but in many instances family members. Additionally, we are also cognizant of the mental health implications of these actions. Instances of anxiety, depression, feelings of betrayal and PTSD symptoms have been reported. DACA students have developed deep relationships in the state of Oregon and contribute in volunteer hours to the essence of the communities in which OSU has a presence. The distress DACA students experience undermines OSU’s educational mission because it distracts from students’ studies, and in some cases, requires OSU to divert finite counseling and financial or academic

advising resources to assist those students, rendering those resources unavailable to other students who may also need them.

8. OSU understands that we achieve excellence through diversity and this decision impedes our ability to reach our strategic goals. We remain committed to our mission and vision for the state of Oregon and to the success of our DACA students.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED September 15, 2017.



CHARLENE ALEXANDER